

DANIEL SZALKIEWICZ & ASSOCIATES, P.C.

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John Doe

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

John Doe.

Plaintiff,

v.

Baila Sebrow

Defendant

Case No. 2:21-cv-20706

**Certification of Declaration of Daniel S.
Szalkiewicz, Esq. in Support of Request
for Entry of Default**

DANIEL S. SZALKIEWICZ, of full age, hereby certifies and states:

1. I am a partner at the law firm of Daniel Szalkiewicz & Associates, P.C., attorneys for the Plaintiff in the above-captioned action. As such, I have personal knowledge of the facts contained herein.

2. I make this Certification in support of Plaintiff's application for the entry of default against defendant Baila Sebrow ("Defendant"), pursuant to Federal Rule of Civil Procedure 55(a).

3. Plaintiff's Complaint in this matter was filed on December 23, 2021 (DE 1). The Summons was issued on December 28, 2021 (DE 2).

4. On June 1, 2023, Plaintiff filed an amended complaint (DE 58).

5. On July 10, 2023, Defendant's answer to Plaintiff's amended complaint was stricken by court order (DE 76). The defendant was directed to file a motion seeking leave to answer the amended complaint (DE 76).

6. I have not heard from Defendant nor any counsel for Defendant concerning the filing of an answer to the amended complaint and, to my knowledge, no filing with the Court was made by Defendant under Local Civ. R. 6.1(b).

7. On August 28, 2023, the Court granted leave for Plaintiff to seek a default (DE 89).

8. The time in which Defendant may answer or otherwise respond to Plaintiff's Amended Complaint has expired and has not been further extended by the Court, and Defendant has not answered or otherwise moved.

9. Accordingly, this request is being made for the entry of default against Defendant in the above-captioned matter.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Executed on: September 18, 2023
New York, NY

/s/Daniel Szalkiewicz, Esq.
Daniel S. Szalkiewicz